



United States of America
FEDERAL TRADE COMMISSION
Washington, DC 20580

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October 9, 2020

VIA ECF

Hon. Louis L. Stanton, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: *FTC, et al. v. Quincy Bioscience Holding Co., Inc., et al.* (17-CV-00124-LLS)
Proposed Stipulation for Extension to Brief Motion for Protective Order

Dear Judge Stanton:

Plaintiffs the Federal Trade Commission and the People of the State of New York by Letitia James, Attorney General of the State of New York ("Plaintiffs") and Defendants Quincy Bioscience Holding Company, Inc., Quincy Bioscience, LLC, Prevagen Inc., Quincy Bioscience Manufacturing, LLC, and Mark Underwood (collectively, "Defendants") (Plaintiffs and Defendants, collectively, "Parties") hereby request that the Court enter the attached proposed stipulated order extending the deadline for Defendants to take any 30(b)(6) depositions of Plaintiffs.

As set forth in the proposed stipulated order, the Parties have met and conferred regarding the permissibility and scope of Defendants' proposed 30(b)(6) deposition notices but have been unable to reach agreement. As a result, Plaintiffs anticipate filing letter-motions requesting a pre-motion conference to seek permission to file motions for protective orders. Given the imminence of the current deadline of October 30, 2020 to complete any 30(b)(6) depositions, the Parties ask for an extension of time to allow the Parties to brief the issues and the Court to issue its ruling.

Respectfully,

/s/ Michelle K. Rusk
Michelle K. Rusk, Attorney
Federal Trade Commission

cc: All parties via ECF